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May 12, 1999

Federal Communications Commission
Washington, D.C 20554

RE: Notice of Proposed Rule Making Docket 99-25

Dear Secretary,

As a Non-Commercial, listener supported broadcast licensee of three FM facilities, we submit these comments in reference to the above Docket in which the Commission seeks comments regarding a Low Power FM Service.

First, we would like to strongly appeal to the Commission to "grandfather" existing translators operated by Non-Commercial Broadcasters such as ourselves. Speaking personally, our radio stations would suffer tremendous financial hardship if we lost our surrounding translators to this new FM service. It is already difficult to operate as a listener supported station with no government grants or funding available. If we were to lose our listeners in small communities around our coverage area, it could be disastrous.

Having said that, WAY-FM Media Group believes in many of the objectives the Commission has set forth regarding the formulation of a new Low Power Service. However, we also have some reservations as well.

We believe that the elimination of the third adjacent channel separations for the LP1000 category would probably not cause any noticeable harm to existing broadcasters (provided that this service does not "bump" existing translators as stated above. However, we do believe that second adjacent LP1000 stations could cause real problems especially in heavily populated areas where blanketing interference is likely to occur.

One compromise might be to allow second adjacent stations only for the lower LP100 or micro stations. Due to the lower power, these stations would probably not cause any serious problems.

Further, we believe that existing **non-commercial** broadcasters should be allowed some limited ownership of these stations (perhaps a maximum of 5 LP1000 and 10 LP100's. Furthermore, we believe that low power station operators should be able to request assistance from outside programming sources. It would be impossible for most Low Power operators to totally man their operations without any "outside" help.

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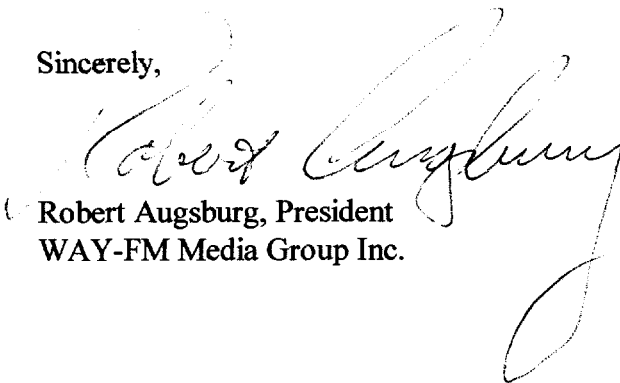
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Once again in summary, **please do not allow low power services to "bump" existing translators operated by Non-Commercial broadcasters.** This would be an incredible financial hardship that could even shutdown some station operators.

Thankyou for the opportunity to be heard on this important issue.

Sincerely,

A handwritten signature in cursive script, appearing to read "Robert Augsburg", written in dark ink. The signature is fluid and extends to the right, with a long, sweeping tail that loops back down.

Robert Augsburg, President
WAY-FM Media Group Inc.